

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SHAW'S SUPERMARKETS, INC.,  
Plaintiff,

v.

UNITED FOOD AND COMMERCIAL  
WORKERS UNION, LOCAL 791,  
AFL-CIO,  
Defendant.

04-CV-11219 DPW

FILED  
IN CLERKS OFFICE

2004 JUN 23 P 4: 11

U.S. DISTRICT COURT  
DISTRICT OF MASS.

**AFFIDAVIT OF ALFRED GORDON IN SUPPORT  
OF MOTION FOR AWARD OF ATTORNEYS FEES**

Alfred Gordon, being first duly sworn, deposes and says:

1. I am an attorney admitted to practice law in the Commonwealth of Massachusetts since 1995 and am currently taking steps to seek admission to practice before this Court. I am a graduate of Cornell University (1992) and Boston University School of Law (1995).

2. I am an associate in the law firm of Pyle, Rome, Lichten & Ehrenberg. Since graduation from law school I have worked in the area of labor and employment law as a neutral and as an advocate for labor organizations and employees.

3. Prior to associating with Pyle, Rome, Lichten & Ehrenberg, from October 1999 through May 2004, I served as a Staff Attorney for the Office of the General Counsel of the Federal Labor Relations Authority. In that capacity, I represented the General Counsel and the Authority in a wide variety of labor matters, from investigating and prosecuting unfair labor practice charges to acting as a hearing officer and drafting Decisions and Orders in representation cases. While employed with the Authority, I also created and presented many training programs on labor and employment matters. In my

first full year with the Federal Labor Relations Authority, the General Counsel of the Authority named me his national Employee of the Year.

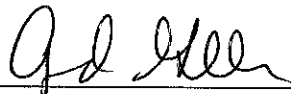
4. In addition to practicing law, for the past four academic years I have been a part-time faculty member at Boston University School of Law teaching research and writing in the School of Law's First Year Writing Program. I have continually been reappointed to this position and have again been so appointed for the 2004-05 academic year.

5. I believe that the hourly rate requested for me in this case \$175, is commensurate with that paid to other attorneys of my experience and knowledge for litigation in labor and employment matters. Because of my knowledge of labor law and my expertise in research and writing, I was able to perform the necessary research and writing in an efficient matter.

6. My billing records show that I worked the following hours in this matter:

<u>Date</u>	<u>Item</u>	<u>Hours</u>
6/4/04	Review complaint and memorandum of Shaw's in support of motion for TRO; research case law	4.5
6/5/04	Research, draft opposition to motion for TRO	4.7
6/7/04	Further research and complete drafting opposition to motion for TRO; work with client for affidavit in support of opposition; contact with Shaw's attorney re schedule for hearing	5.3
6/7/04	Attend court hearing; research re sanctions	2.4
6/18/04	Prepare answer, motion to dismiss, and research for memorandum in support of motion to dismiss	3.9
6/21/04	Further research and drafting memorandum in support of motion to dismiss	4.7

Subscribed and sworn under the pains and penalties of perjury this 22<sup>nd</sup> day of June, 2004.

  
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Alfred Gordon

June 22, 2004